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February 21, 2017

Stephen Healy Mechanical Engineer EPA OTAQ Compliance Division Diesel Engine Compliance Center

Stephen,

We have addressed the items you requested in your email dated February 14, 2017 to allow us to install engines in truck glider kits.

Butler Machinery Company has 860 employees as of January 2017, which is below the level of 1,500 required by 13 CFR 121.201 using the NAICS code 336120.

Butler Machinery Company is solely owned by the following individuals, who are all family.

38%
13%
4%
4%
4%
14%
1%
11%
11%

Butler Machinery has one wholly owned subsidiary, which is North Central Rental and Leasing. We also have ownership interests in MidStates VRS LLC and Rural Tower Network.

Butler Machinery Company has employed the following number of people for each of the last three years as of December 31

2016-858 2015-1014 2014-1032 Butler Machinery Company has installed engines in the follow number of truck glider kits each of the following years

2010-2011-2012-2013-2014-

Christopher Lee, Chief Financial Officer